



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

December 7, 2012

Angie Morris, Recreation Planner
Siuslaw National Forest
855 Highway 101
Reedsport, Oregon 97467

Re: EPA Region 10 Comments on the on the Draft Environmental Impact Statement (DEIS) for the
Oregon Dunes NRA Management Area (EPA Project #93-013-AFS)

Dear Ms. Morris:

We have reviewed the DEIS for the Oregon Dunes National Recreation Area (ODNRA) Management Area (MA) 10(c) Route and Area Designation on the Siuslaw National Forest in Oregon. We are submitting the following comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act (CAA).

Section 309 of the CAA specifically directs the U.S. Environmental Protection Agency (EPA) to review and comment in writing on the environmental impacts associated with all major federal actions. Our review of the DEIS considers the expected environmental impacts, and the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

The DEIS analyzes a no action alternative and four action alternatives. The action alternatives consider variations in the number of miles of designated riding routes and areas designated for open riding. The preferred alternative (Alternative 4) would designate 2.1 miles of routes and reallocate 455 acres from MA 10(C) (Off Road Vehicles on Designated Routes) to MA 10 (B) Off-Road Vehicle Open. This alternative would also close approximately 84 miles of user-developed routes.

In our July 2011 scoping comments we indicated support for the proposed action (Alternative 2). Relative to Alternative 2, the preferred alternative (Alternative 4) reallocates an additional 221 acres to MA 10 (B) and closes 18 fewer user-developed routes. We support the proposed closure of unauthorized routes under Alternative 4, but we encourage the Forest to consider bringing forth elements from Alternatives 2 and 3 as the final preferred alternative is developed.

In particular, we note that the reallocation of areas A4 and portions of A16 under Alternative 4 would result in high impacts to native plant associations (Table 29). We also note that area A16 still has many intact portions of native vegetation and likely still supports use by nesting, migrating and wintering birds. As noted on page 106 of the DEIS, the proposed change in management of this area to MA 10 (B) would likely cause further degradation of native vegetation, making this area less suitable for land birds. Given these potential impacts we make the following recommendations:

- 1) Revise management direction for area A4 to avoid impact to areas where shore pine/slough sedge associations are present; or pursue the management strategy under Alternative 3 for this area.
- 2) Revise management direction for area A16 to avoid impact to the 19 percent of the reallocation area that is mapped as native vegetation; or pursue the management strategy under Alternative 2 for this area.

We also note that the risk of introducing or spreading invasive species via reallocations from MA 10 (C) to MA 10 (B) is "high" under Alternative 4 (Table 30). Control of invasive plant species is discussed under Project Design Criteria (DEIS p. 51), however detail is lacking. It is stated that invasive plant species would be controlled "by the most effective means allowed." We recommend that the FEIS discuss management triggers/thresholds and measures (herbicides, biological controls, mechanical removal, etc.).

If herbicides are to be used to control infestations, mitigation measures should be identified to avoid herbicide drift to streams and wetlands during ground and aerial applications. Measures might include the identification of streamside buffers, mechanical weed removal adjacent to streams, flagging aquatic areas on the ground, spray nozzles that produce larger droplets to reduce drift, use of photodegradable dyes in herbicides, use of GPS technology, use of spray detection cards, wind monitoring, herbicide monitoring, etc.).

In addition, we believe that recommendation 2 above would substantially address the risk of invasive plant infestation by reducing the number of acres under MA 10 (B).

Due to our concerns over native plant associations, bird habitat and invasive species, we have rated the proposed alternative EC-1 (Environmental Concerns – Adequate). An explanation of this rating is attached. We appreciate the opportunity to provide comments, and we believe that the management plan will play an important role in establishing a more comprehensive and understandable system of designated routes for the ODNRA. Please contact me with any questions at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Teresa Kubo of my staff at (503) 326-2859 or kubo.teresa@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.